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March 3, 2025

**BY ECF**

Honorable Denise L. Cote  
United States District Judge  
Southern District of New York  
500 Pearl Street, Room 1910  
New York, NY 10007

RE: Skillz Platform Inc. v. Papaya Gaming, Ltd., et al., No. 1:24-cv-01646-DLC (S.D.N.Y.)

Dear Judge Cote:

Pursuant to Rule 8.B of Your Honor's Individual Practices, we write on behalf of Defendant and Counterclaim-Plaintiff Papaya Gaming, Ltd. ("Papaya") concerning Papaya's March 3, 2025 Motion for Leave to File Second Amended Counterclaims ("Motion") as well as the accompanying Memorandum of Law in Support ("Memorandum"), Declaration of Michael A. McIntosh ("Declaration"), and exhibits thereto.

Papaya's Memorandum and certain exhibits attached to the Declaration (which include exhibits to the proposed Second Amended Counterclaims) consist of, and/or refer to, documents that Skillz Platform Inc. ("Skillz") and third parties have produced in this litigation and designated Confidential, Highly Confidential, and/or Highly Confidential—Outside Counsel's Eyes Only under the Protective Order entered in this action, ECF No. 39. Certain exhibits also contain categories of information that Skillz has contended "constitute[] confidential trade secrets and must be filed under seal." ECF No. 108. The Court has authorized Skillz to file such information under seal. *See* ECF No. 111.

Accordingly, Papaya seeks leave to file unredacted versions of the Memorandum and certain exhibits to the Declaration under seal. Papaya will file redacted versions of the Memorandum and certain exhibits on the public docket.

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Respectfully submitted,

/s/ Anthony J. Dreyer  
Anthony J. Dreyer

cc: Counsel of record (by ECF)